

Magistrate Judge Grady J. Leupold

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December 5, 2023	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY _____	DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

COREY E. HUFF,
Defendant.

NO. MJ23-5424

COMPLAINT for VIOLATION

Title 18, United States Code, Section
922(g)(1)

BEFORE, GRADY J. LEUPOLD, United States Magistrate Judge, United States
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Firearm)

On or about December 6, 2023, in Pierce County, within the Western District of
Washington, COREY E. HUFF knowing he had been convicted of the following crime
punishable by a term of imprisonment exceeding one year:

i. *Possession with Intent to Distribute Cocaine*, in Muscogee County,
Georgia, under case number 773937, on or about March 8, 2013; and

1 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
2 is: a Glock handgun, that had been shipped and transported in interstate and foreign
3 commerce.

4 All in violation of Title 18, United States Code, Section 922(g)(1).
5

6 And the complainant states that this Complaint is based on the following
7 information.

8 I, Michael R. McDowell, being first duly sworn on oath, depose and say:

9 1. I am a Special Agent (SA) with the United States Drug Enforcement
10 Administration (DEA) and have been so employed since September 2021. I am currently
11 assigned to the Seattle Field Division. In this capacity, I investigate violations of the
12 Controlled Substance Act, Title 21, United States Code, Section 801, et seq., and related
13 offenses. I have received specialized training in the enforcement and investigation of the
14 Controlled Substance Act. I have received over 620 hours of classroom training
15 including, but not limited to, drug identification, drug interdiction, detection, money
16 laundering techniques and schemes, smuggling, and the investigation of individuals
17 and/or organizations involved in the illegal possession, possession for sale, sales,
18 importation, smuggling, cultivation, manufacturing, and illicit trafficking of controlled
19 substances.

20 2. In my role as a SA for the DEA, I have participated in controlled substance
21 investigations which have resulted in the arrests of individuals, the seizures of illicit
22 drugs and/or drug-related evidence, and the forfeiture of drug-related assets. I have been
23 involved in the service of search warrants as part of these investigations. Because of my
24 experience in serving these search warrants, I have become familiar with various tools,
25 methods, trends, paraphernalia and related articles utilized by traffickers in their efforts to
26 import, conceal, and distribute controlled substances. I am also familiar with methods of
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1 packaging, delivering, transferring, and laundering drug proceeds. Additionally, through
2 my training and experience, I can identify what are likely illegal drugs by sight, odor, and
3 texture.

4 3. I have participated in the debriefing of witnesses and informants. I have
5 also discussed with and learned from other law enforcement investigators about methods
6 of drug smuggling, distribution, packaging, trafficking, avoiding law enforcement, and
7 laundering proceeds, among other concerns related to drug trafficking.

8 4. In addition to practical experience, I have received formal training in
9 controlled substances enforcement. This includes training regarding controlled substance
10 recognition, field testing, undercover investigations, telecommunications analysis, and
11 surveillance techniques.

12 5. I have also been previously certified and employed as a Police Officer in
13 the city of Greenfield, Massachusetts. I was employed as a Police Officer from February
14 2015 through September 2021, during which time I conducted, or otherwise participated
15 in the investigation of over 400 felony offenses, and over 2,000 misdemeanor offenses. In
16 my capacity as a Police Officer, I received specialized training from the Massachusetts
17 Municipal Police Training Committee regarding drug interdiction, and detection
18 techniques. I have conducted, or otherwise participated in criminal investigations,
19 including, but not limited to Possession of Controlled Substances, Distribution of
20 Controlled Substances, Illegal possession of Firearms, financial and benefits-related
21 fraud, and pharmaceutical-related theft. I also completed the Drug Evaluation and
22 Classification program, administered by the National Highway and Traffic Safety
23 Administration, and was subsequently certified as a Drug Recognition Expert from 2018
24 to 2022.

25 6. I am providing the information in this Affidavit both from my personal
26 observations and knowledge and from information obtained from other law enforcement
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1 officers and agents. The information outlined below is provided for the limited purpose of
2 establishing probable cause and does not contain all details or all facts of which I am
3 aware relating to this investigation.

4 7. On November 29, 2023, a Grand Jury sitting in the Western District of
5 Washington returned an indictment against 10 members of a drug trafficking organization
6 referred to herein as the VALENCIA ROSAS DTO. On December 6, 2023, agents
7 executed a series of search warrants issued by this Court related to the investigation into
8 the VALENCIA ROSAS DTO; one of those warrants was issued for a residence located
9 at 5108 San Francisco Ave SW, Trailer #35, Lakewood, Washington.

10 8. Agents executed the warrant at the Lakewood, WA residence in the early
11 morning hours of December 6, 2023.

12 9. COREY HUFF was found in the master bedroom of the residence. Next to
13 the bed was a dresser. Located in the top drawer of the dresser was HUFF's ID card and
14 an unknown sum of money. Adjacent to the dresser was a bed. A Glock firearm was
15 recovered from between the mattress and the box spring of the bed. The firearm was
16 loaded with 10 rounds in the magazine, and 1 found in the chamber.

17 10. HUFF was provided his *Miranda* warning and provide a statement to law
18 enforcement. HUFF stated that upon law enforcement's arrival to the residence, he began
19 flushing controlled substances down the toilet including cocaine, mushrooms and pills.
20 Agents recovered blue residue from the toilet.

21 11. In another room of the residence, agents recovered a 12 ton shop press, a
22 kilogram mold, an unknown white substance, and a scale.


23 12. I have reviewed court and law enforcement records related to HUFF's
24 criminal history. These records show HUFF is a convicted felon, which prohibits him
25 from possessing firearms. Specifically, HUFF was convicted in the State of Georgia, in
26 Muscogee County case number 773937 for an offense of possession with intent to
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1 distribute cocaine committed on March 8, 2013. On June 17, 2013, he was sentenced to
2 serve 15 years in prison.

3 13. Glock firearms are not manufactured within the State of Washington.
4 Therefore, the firearm must have traveled in interstate or foreign commerce before Corey
5 HUFF, possessed them in the State of Washington.


6 14. Based on the above facts, I respectfully submit that there is probable cause
7 to believe that COREY HUFF did knowingly and intentionally possess a firearm in
8 violation of Title 18, United States Code, Section 922(g)(1).

9 15. This Complaint is being presented by reliable electronic means pursuant to
10 Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

11
12 
13 MICHAEL R. McDOWELL
14 Special Agent, Drug Enforcement
15 Administration

16 The above-named agent provided a sworn statement attesting to the truth of the
17 foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court
18 hereby finds there is probable cause to believe the Defendant committed the offenses set
19 forth in the Complaint.

20
21 Dated this 6th of December 2023.

22
23 
24 GRADY J. LEUPOLD
25 United States Magistrate Judge
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